IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

Scott Sedore # 210661

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 2:21-cv-12623 Judge: Drain, Gershwin A. MJ: Altman, Kimberly G. Filed: 10-26-2021 At 03:24 PM

PRIS SCOTT SEDORE V SIRENNA LANDFAIR ET AL (SS)

Jury Trial:

- 1) Sirenna Landfair (RN)
- 2) Brian Stricklin (RN)
- 3) Alinda Florek (RN)
- 4) Victoria Hallett (00) 5) michigan Department of Correction's ("M.D.O.K.")
- 6) Corizon Health Inc...

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil Rights (Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I.	The	Parties	to	This	Com	plaint
----	-----	----------------	----	------	-----	--------

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

	Name	Scott Sedore # 210661
	All other names by v	which you have been known:
		4
	ID Number	# 210661
X	Current Institution	G. Robert Cotton Correctional Facility
Х	Address	3500 North Elm Road
		Jackson, michigan
		1 49201

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

X Defendant No. 1

Name	Sirenna Landtair (RN)
Job or Title	Health Unit Manager ("H.U.N.")
(if known)	. 1
Shield Number	N/A
Employer	Michigan Department of Correction's
Address G. Rober	Michigan Department of Correction's + Cotton Corr. Facility - 3500 N. Elm Road
	Jackson, michigan - 49201
X Individual capac	

×	Defendant No. 2
	Name Brian Stricklin (RN) Job or Title (if known) Nursing Supervisor
	Shield Number NA
	Employer Michigan Department of Correction's
	Address G. Robert Cotton Corr. facility - 3500 N. Elm Road
	Individual capacity
X	Defendant No. 3
	Name _ Alinda Florek (RN)
	Job or Title (if known) Nurse (Registered)
	Shield Number NA
	Employer michigan Department of Correction's
	Address G. Robert Cotton Corr. facility - 3500 N. Elm Road
	Jackson, michigan-49201
	Individual capacity
×	Defendant No. 4
	Name Victoria Hallett (00)
	Job or Title <u>medical Doctor</u> (if known)
	Shield Number
	Employer Correspond Health Inc.
	Address 6452 Millenium Orlve, Suite 100
	Lansing, Michigan - 48917
	Individual capacity Official capacity

Defendant No. 5

name: Michigan Department of Corrections ("M. O.O.C.")

Job or Title: Michigan State Prison System

shield number! , NIA

Employer: State of Michigan

Address: G. Robert Cotton Corn. Facility - 3500 N. Elm Road Jackson, michigan -49201

Individual Capacity Official Capacity

Defendant No. 6

name: Corizon Health Inc... Job or Title: medical Insurance Provider

shield number: NIA

Employer: Corizon Health Inc...

Address: 6452 millenium Drive, Suite 100

Lansing, michlgan - 48917

Individual Capacity

official Capacity

Defendant No. 7

name; Job of Title! shield number: Employer: Address;

> 11 official Capacity 1 Individual Capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

- A. Are you bringing suit against (check all that apply):
 - ☐ Federal officials (a *Bivens* claim)
 - State or local officials (a § 1983 claim)
- B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1) Hotation's of the 8th Amendment to the US. constitution of Octiberate Indifference" to my serious medical need's

- 2) violation's of Title II of the American's with Disabilities
- (3) violation's of the Rehabilitation Act.
 - violation's of the 1st Amendment to the 4.5: Constitution
 ("Retaliation")

 Plaintiffs suing under Bivens may only recover for the violation of certain constitutional
- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Defendants Acted under color of state Law! Defendants all worked in a michigan Department of corrections pentitentiary. They are required under state and federal laws to not only protect the safety and security of the General Public-But they are required to work and Act and follow and Execute michigan state Law's and Uis, federal Law's.

They are required to protect my state and federal civil right's. They treated me "Inhumanely", they violated my state and federal civil right's law's.

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

	Pretrial detainee
	Civilly committed detainee
	Immigration detainee
×	Convicted and sentenced state prisoner
	Convicted and sentenced federal prisoner
	Other (explain)

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed. (lease refer to attached statement of facts / claims)

A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.



- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

 6, Robert Cotton Correctronal Facility ("JCF")

 3500 North Elm Road

 Jackson, Michigan

 4920)
- please refer to attached "statement of facts/claim's for Details of Alleged violation's of uis, civil right's, Title II of the Americani w/Disabilities and Rehabilitation Acts
- (x) Between 7/24/19 present (6/16/2021)
 - C. What date and approximate time did the events giving rise to your claim(s) occur?
 - Between 7/24/19-present

 (*) please refer to attached "statement of facts/claims"

 for specific dates/times, etc...
- (*) some outside of the Above stated Dates!

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

(A) please refer to attached "statement of facts / dains"

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

(x) please refer to attached "statement of facts/claims"

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

A please refer to the last page of my Handwritten "statement of facts / claims" to the page that say's at the top of the page "Relief Sought"!

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

•		y and definition of the dieg.
A.	Did facil	your claim(s) arise while you were confined in a jail, prison, or other correctional ity?
	×	Yes
		No
	If ye the ti	s, name the jail, prison, or other correctional facility where you were confined at time of the events giving rise to your claim(s). Gi Robert Cotton Correctional facility ("JCF") 3500 North Elm Road Jackson, michigan 4920
В.	Does griev	the jail, prison, or other correctional facility where your claim(s) arose have a ance procedure?
	X	Yes
		No
		Do not know
C.	Does your	the grievance procedure at the jail, prison, or other correctional facility where claim(s) arose cover some or all of your claims?
	$\not\!$	Yes
		No
		Do not know
	If yes,	which claim(s)? All of my claim's outlined all of my revances at step#1, step#2, step#3 Appeal,

D.

D.	Did y claim	ou file a grievance in the jail, prison, or other correctional facility where your of arose concerning the facts relating to this complaint?
	×	Yes
		No
	If no, jail, p	did you file a grievance about the events described in this complaint at any other orison, or other correctional facility?
		Yes
		N_0 N/A
E.	If you	did file a grievance:
	1.	Where did you file the grievance? 6. Robert Cotton Correctional facility ("JCF") 3500 North Elm Road Jackson, michigan 4920)
	2.	What did you claim in your grievance?
_	Ato.	labori of the 8th Amendment (" Deliberate Indifferen
- (IIola	hong of Title I of the Americani w/ Disabilities Ac
•		tions of the Rehabilitation Act
- 1	viola	ation's of the 1st Amendment ("Retaliation")
- ,	Ilola	tron's of the 8th Amendment ("Deliberate Indifference")
	3.	What was the result, if any? none of my 15 sues were resolved one grevances were rejected" we grevances were denred"
	- 5	one grevances were rejected"
_	500	re grievances were denred
	The	Milioic, and other Defendants never
	off	fer any legitimate resolution.

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I confleted the grevance process thru all "3" steps of the M. D.O.C. grevance process. I have exhausted any /all "available" Administration Remedies.

- F. If you did not file a grievance:
 - 1. If there are any reasons why you did not file a grievance, state them here:

NA

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

N/A

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

NA

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

A.	Have invol	you file lved in th	ed other lawsuits in state or federal court dealing with the same facts his action? There are additional facts involved in this lawsuit,
	X	Yes	Alex there are att Clausents - but they had different
		No	Ortendant's, different instances, periods of times, different facilities/prisons
B.	If yo	ur answe	er to A is yes, describe each lawsuit by answering questions 1 through 7

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1.	Parties to the previous lawsuit
	Plaintiff(s) Scott Sedore #210661
	Defendant(s) Duncas MacLaren
2.	Court (if federal court, name the district; if state court, name the county and State)
	Western District Federal Court (Northern Division
3.	Docket or index number

2/17-00-7

	4.	Name of Judge assigned to your case
		Janet Noff
	5.	Approximate date of filing lawsuit
		January, 2017 (approximately)
	6.	Is the case still pending?
		□ Yes
		No No
		If no, give the approximate date of disposition. 2026
	7.	What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)
	- 1	The case was dismissed at 2nd rummay judgome 201
	ーブ	he case then went to The 6th court of
		Appe-1 Densed,
C.	Have cond	e you filed other lawsuits in state or federal court otherwise relating to the itions of your imprisonment?
	×	Yes
		No
D	belov	ur answer to C is yes, describe each lawsuit by answering questions 1 through 7 w. (If there is more than one lawsuit, describe the additional lawsuits on another, using the same format.)
	1.	Parties to the previous lawsuit
		Plaintiff(s) Scott Sedon # 210661
		Plaintiff(s) Scott Sedone # 21066/ Defendant(s) Michael Warner
	2.	Court (if federal court, name the district; if state court, name the county and State) Eastern District Federal court
	3.	Docket or index number $4-19 - (v - 10259)$

	4.	Name of Judge assigned to your case
		matthew F, Leitman
	5.	Approximate date of filing lawsuit
		January, 2019
· (X	6.	Is the case still pending?
		□ Yes
		⊠ No
		If no, give the approximate date of disposition. <u>settlement reached</u> - June, 2021
	7.	What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)
		Lawyer appointed by court - Dansel manuille
Unde knov impr litiga modi speci furth	er Feder, ivledge, i oper puration; (2) ifying, o ifically ser inves	al Rule of Civil Procedure 11, by signing below, I certify to the best of my information, and belief that this complaint: (1) is not being presented for an expose, such as to harass, cause unnecessary delay, or needlessly increase the cost of is supported by existing law or by a nonfrivolous argument for extending, or reversing existing law; (3) the factual contentions have evidentiary support or, if so identified, will likely have evidentiary support after a reasonable opportunity for tigation or discovery; and (4) the complaint otherwise complies with the sof Rule 11.
) A.	For P	
	refale	Parties Without an Attorney
	file w	Parties Without an Attorney se to provide the Clerk's Office with any changes to my address where cased papers may be served. I understand that my failure to keep a current address on with the Clerk's Office may result in the dismissal of my case.
	file w	be to provide the Clerk's Office with any changes to my address where cased papers may be served. I understand that my failure to keep a current address on

IX.

VILLE Trevious Lamisuity in house

- Defendant: Sherman Campbell, et al.,

 Court: Eastern District Federal Court

 Docket of Index number: 2:19-cv-1031/

 name of Judge assigned: Stephanie Dawkins Davis

 Is case still Pending? yes Date filed: January, 2019
- Defendant! Sherry Burt, et al.

 Court: western District Federal court (southern Division)

 Docket of Index number! 1:16-CV-903

 Name of Judge Assigned: Paul L. Maloney

 Is case Still pending? no, dismissed at 2nd summary

 Judgement, 2019!
- Defendant! Noah Nagy, et al.

 Defendant! Noah Nagy, et al.

 Court! western District federal court (southern Division)

 Docketor Index number! 1:19-CV-61

 name of Judge Assigned: Robert J. Jonker

 Is case still fending? no dismissed at summary

 Tudgement for "Lack of exhaustron"

Next. Having Lawson's contraved 122

Plaintiff: Scott Sedore # 21066/
Defendant: Corizon Health Inc., ETAL,

Court: Eastern District Federal Court

Docket of Index number: 2:21-cv-11643

Name of Judge Assigned: stephen J. murphy, III

Is case still Pending?

Oate filed Ponor

June, 2021!

(5) Plaintiff! Scott Seedore #21066/

Orfendant: Sirenna Landfair, et al.

Court: Eastern District Federal Court

Docket or Index number!

name of Judge Assigned:

Ts case still Pending ? yes Date filed (11/1/2021)

Plaintiff! Scott Sedore #210661

Defendant!

Court!

Docket or Index number!

Name of Judge Assigned!

Is case Still Pending?

Da

Date Filed?

Additional Information:

Scott Sedore

V5.

Sirenna Landfair, et al.

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.20 Filed 10/26/21 Page 20 of 51

Defendants in Lawsuit"

- 1) Sirenna Landfair (RN)
- 2) Brian Stricklin (RN)
- 3) Alinda Florek (RN)
- 4) Victoria Hallett (DO)
- 5) Michigan Department of Correction's ("M.D.O.C.")
- 6) Corizon Health Inc...

"Statement of Claims"

This Lawsuit is being brought after an "ongoing" pattern of discrimination, Harrasement, neglect, mistreatment, and Inhumane treatment regarding my Healthcare treatment led and turned into a case of "Retaliation", a 1st Amendment Violation. The main incident in question happened on 6/16/2021 at G, Robert Cotton Correctional facility ("JCF"). It occurred in the "Jcf" Healthcare Services Building. All defendants in this lawsuit have acted under Color of State Law."

The incidential question, and me being placed in segregation on 6/16/2021 was not a coincidental incident. It did not happen by mistake. It was well planned and thought out. It was more than poor judgement by the defendant's involved in this issue. It was deliberately done to harass, intimidate, deter me from purouing protection of my 8th Amendment Civil rights and legitimate, Adequate Healthcare treatment from the defendant's and other's who control and distribute medical care at "JCF." The M.O.O.C., correct Health, and all relevant employee's. I have a long history of advocating for adequate medical treatment since coming to the MiD.O.C. on 5/19/11. I have filed probably over 1000 grievances related to my healthcare treatment since that time. This has happened all across the state of michigan in numerous correctional facilities. I have been "Shuffled" all around the "MiD.O.C." since arriving in the "MiD.O.C." on or around 5/19/11. Often transferred as a direct result of disagreement's with healthcare staff over my medical treatment, Advocating that the MiD.O.C. girevance process to receive medically necessary treatment, and as a direct result of filing mulkple (5-prior) federal civil rights lawsuits own neglect, wistreatment, Inhumane treatment by "MiD.O.C." and Corizon Health Inc.,, medical staff, I have been "retaliated" against, harrassed, discriminated against, humiliated) embarrased as a direct result of my Advocating for better healthcare treatment.

I can show that defendant's action's on 6/16/21 meet the criteria of a 1st Amendment violation (Retaliation Claim).

A "Retaliation" Claim essentially entail's three Elements:

- 1) The Plaintiff engaged in Protected Conduct
- (2) An Adverse action was taken against the plaintiff that would deter a person of ordinary firmness from continuing to engage in that conduct.
- (3) That there is a casual connection between element's one and two, that is, the adverse action was motivated at least in part by the plaintiff's protected conduct.

I can establish and prove every single element in my Retaliation claim,

(A) The "Protected Conduct" in questroin is my pursuit of protection's of my 8th

Amendment civil Rights. At the time of this incident, I was engaged in an

"ongoing" fright for Adequate, legitimate Health care treatment needs, prior to

coming to "JCF" on 7/24/19 - I had filed 5-previous federal Lawsuit's under 42 U.S.C. \$1983, over my medical treatment by MIDIOICI and Cortzon Health Inc. staff at multiply other correctional facilities. At the time of the 6/16/21 Retaliation incident, I was actively since arriving at "Jef" on 7/24/19 engaged in writing around 200 greevances related mostly to "deliberate Indifference" of my serious medical needs. Defendant's were all well aware of my persistant (past and present) grievance writing and history of filing federal litigation concerning violation's of my 8th Amendment civil rights, under the theory of "Deliberate Indifference" to my serious medical needs. I was actively advocating for protection of my 8th Amendment civil right's between 7/24/19 arrival at "JCF" and the date in question of incident on 6/16/2021. I had wrote around 200 grievances at "JCF" alone, and was in the process of filing another federal lawsuit over Healthcare treatment at "JCF" between 7/24/19 and the date of the Retaliation" incident on 6/16/2021. I filed a 42 U.S.C. \$1983 lawsuit in the Eastern District Federal court on or around July, 2021. Case No. #2121-CV-11643!

This Lawsuit our the "Retaliation" claim is completely seperate from that lawsuit (#2121-cv-11643), This lawsuit is a seperate Issue, and I wish to File and keep it seperate from Case No. 2121-cv-11643! one is a lawsuit about "Deliberate Indifference" (8th Amendment) violation's, This lawsuit is about "Retaliation" (1st Amendment) violation's.

I'mnot required to prove every aspect of my law suit at this point, I am only attempting to show that my claim's are legitimate at this point, so this Honorable court will allow my "ketaliation" claim to proceed forward, thru the process of lingation, I have most certainly stated a legitimate claim in my "statement of Claim's".

B) The next element of my "Retaliation" claim - "That defendant's took an adverse action against plaintiff that would deter a person of ordinary firmness from continuing to engage in that conducti"

H. u.m. - streng Landfair and defendant's had me put in segregation on a self ham/ injurious - trumped-up charge/allegation that had no merit, This was on 6/16/2021.

During the "ongoing" interaction's with HiviMi - sirenna Landfair on C/16/2021, while I was in the healthcare services nurses station, HiviMi, sirenna Landfair brought up my past medical kites and grievances, stating "you don't have no problem " clarifying what your point is or what you mean to say in your kites and grevances."

she was referring to what I wrote about in my kite and attached paperwork that I sent to thealthcare services on 6/15/2021, After I talked to pr Victoria Hellett on the telephone from my Housing unit. About how I had cut myself and bled for several telephone from my Housing unit. About how I had cut myself and bled for several hours. About me cutting my heel on my wheelchair around I-week prior. It should have been very clear and apparent once I showed her my heelon 6/16/21 while in the nurses station - that I had not treed to harm myself in any way, yet Him. Landfair and other defendants decided to remove the obvious, that I had not tried to harm myself in any formor way, she had her mend made up, and saw an opportunity to harrass me in any formor way, she had her mend made up, and saw an opportunity to harrass me and liketaliate "against me, on 6/16/21 during "ongoing" interaction's with Him. Landfair, sho made it very clear that she did not appreciate my past kites and greevances related to constitutional violation's involving neglect, unstreatment, Inhumane treatment in all matters of my "ongoing" medical treatment between 7/24/19 - present date, she brought upmy kites and grevences. I did not bring the issue up on 6/16/21, she made the reference on herown in an attempt to determe from continuing my fight for protection of my 8th Amendment civil rights, related to my health care treatment at "JCF", This was her way to determe from continuing down the path of Advocating for my 8th Amendment right's, she had me put in segregation on a "Trumped-up" Allegation that I may be suicidal or trying to harm myself. I never told anyone that I had any thoughts of self-harm in my 6/15/21 kite to Or Hallett, ormy 6/16/21 discussion with defendants in person while I was in "Jef" Healthcore services building,

O The 3rd element of my "Retaliation" claim, "That there is a casual connection between element's one and two, that is, the adverse action was motivated at least in part by the plaintiff's protected conduct."

The parties involved in the issue of this lawsuit are all well aware of my past fight to protect my 8th Amendment civil right's regarding my "ongoing" healthcare treatment. They are all aware of my "ongoing" fight to protect my civil right's regarding "ongoing" "ongoing" "ongoing" "ongoing" "ongoing" they are all aware of my "ongoing" fight to protect my civil right's regarding "ongoing" "ongoing" at "Icf" between my 7/24/19 arrival at "Icf" and present date, They all had in the past received and answered numerous Kotes and grievances individually about my request's for medical treatment that I was not receiving. The grievances were not answered by all defendants involved in the issue of this lawsuit, but on more than one occassion they were being involved in the issue's of the grievances that I wrote that occassion they were being involved in the issue's of the grievances that I wrote that included them and treatment they had been involved in, All their defendants probably included them and treatment they had been involved in, All their defendants probably had knowledge that I was working on filing litigation (cost No. 2121-cv-11643), because

on numerous occassion's prior to 6/16/2021 - I had referred to the fact that I was going to file a lawsuit over my "ongoing" medical treatment at "Jcf." I had referred to an upcoming lawsuit in some of my kites and some of my in person interraction's with "Jcf" Healthcare staff. They knew about it on 6/16/21 when they put me in segregation on the trumped-up Allegation's of self-injurious behavior that simply was not true in any way or form. This incident on 6/16/21 was most certainly an act of "Retaliation". A collaboration between all individuals that I named as defendants in this lowsuit. The actions of the defendants involved in the present lawsuit was most certainly motivated and related to my advocating for adequate medical care and protection of my UIS, constitutional -civil rights under the 8th Amendment.

Each defendant that I named in this law suit is directly involved with my 6/15/2021 "Kite" that I sent to Dr Victoria Hallett regarding my Low Blood Platelet's, I spoke to Dr Hallett on the telephone from my housing unit on 6/15/21 prior to writing a Kite and attaching other paperwolk concerning pain management with "Lyrica" to it - And sending it to "Jef" Healthcare services on 6/15/21,

- 1) I addressed the 6/15/21 Kite specifically to or Victoria Hallett (at the top of kite)
- 2" JCF" nursing Supervisor Brian stricklin (RN) probably received and reviewed my kite. I'm sure that he either forwarded my "Kite" to Dr Victoria Hallett, or the discussed it with her face to face, I'm sure that at some point he contacted "JCF" Health unit manager ("H.U.H.") Strenna Landfair and discussed my kite with her, This was probably on 6/15/21 or 6/16/21
- 3) "JCF" Health unit manager ("H.U.M.") strenna Landfair (RN) and nursing Supervisor Brian stricklin (RN) thin got nurse Alinda Florek (RN) involved. At some point these individual's discussed and had me called over to "JCF" Healthcare Services, by calling my housing unit and telling my unit officer to send me to "JCF" Healthcare services. This was probably on Ulisor 6/16/21.
- 4) Also involved in this issue is the Michigan Department of correction's ("MiDioici") for violation's of Title II of the American's willisabilities and Rehabilitation Acts. They have policies, procedures, practices in place to ration, limit, delay, deny necessary midical treatment, Also, I was placed in a "Cage" in segregation with my wheelchair for several hours. This cage was not -

- B) Handscap Accessible of meant to Hold somebody who was permanently wheelchair Bound, I could basely fit into this case with my wheelchair, and it caused me debilitating pain to be kept in there, in my wheelchair for several hours while I awaited Or Jones to come see me and assess for several hours while I awaited Or Jones to come see me and assess me, I was very cramped up and in Agonizing pain the whole time I was in the Cage,
 - (5) Also involved in this issue is Corleon Health Inc... for policies, practices, procedures in place to ration, limit, delay, deny necessary medical attention and treatment. I am claiming that they are involved in the Act of the "Retaliation" as well because of those policies, practices, procedures to violate my 8th Amendment civil rights, Because of there "deliberate Indifference" to my serious medical needs.

O nurse Alinda Florek (RN) and Health unit manager ("HUIM,") strenna Landfair (RN) were present in the nursing station on 6/14/21, I spoke extensively to both nurse Alinda Florek (RN) and "H.U.M." strenna Lond fair (RN) on 6/16/21, before I was taken away in Handcuff's. I Begged and Pleaded with Both not to put me in segregation.

DAFLE and this

After speaking extensively to "Hillim" strenna Landfair and nurse Alinda florek (RW) on blood - "Hillim" strenna Landfair (RW) left the nuises station, leaving me with nuise Alinda florek (RW), we continued to speak during this time, "Hillim" Landfair went out and spoke to either nuising supervisor Brian stricklin (RW) or Dr Victoria Hollett or spoke to Both - And they decided despite my complete denial of ever engaging in any self-injurious behavior pastor present, that they would go ahead and place me in segregation, segregation is eithered to the "Jef" Healthcare Services unit, in the same Building, within 5-10 minutes of "Hullm." Landfair going out and speaking to other defendants an officer from segregation unit came into the nuises Station and Handcuffed me while I sation my wheelchair, The officer than pushed me in my wheelchair j to the segregation unit. He opened and pushed me and my wheelchair into a "Cage" and locked the door behind me. This "Cage" barrly fit me and my wheelchair into I could not move at all. It was very painful and uncounterable to sit in this "cage" for several hours while I wasted far Dr Jones to come and assess we. Healthcare staff contacted "Jef" mental Health services Dept. and left a message with the unit secretary that I was in the

Segregation "cage" waiting to be assessed by mental Health staff for self-injurious behavior, despite no evidence I had ever triced to harm myself in any way. I suffered in Agonizing pain during this time, I was those for several hours! At one point a woman "custody" seargant walked by the cage I was in and stated "That is a reach, a stretch—to put you in this cage for a cut on your heel", Eventually, after a couple hours, and I had missed my Law Library call-out, Dr Jones (Jos-psychologist) came. I to segregation and spoke to me, After our discussion Dr Jones told we that I to segregation and spoke to me, After our discussion Dr Jones told we that I have an appointment with her on the next day, 6/17/2021, She thin told would have an oppointment with her on the next day, 6/17/2021, she then told segregation staff to release me from the "Cage". I went back to my Housing unit after I was released, when I saw Or Jones the next day (6-17-2021) she told me that it was rediculous that I was put in segregation for self-injurious behavier, when the cut I had was a "scrape" on my heel of my foot. That it was over I-week old I that it had a "scab" on it. Also, it was ridiculous because nobady ever claimed that I had wrote in my kite on 6/15/21 or during my conversation with healthcare steff on Clicks - had I ever told anybody that I wanted to harm myself in the pastor presents Or Jones also went on to Say I misedore, I went and attempted to speak with the "Hilliti" sivening Landfair on UliU/21 (yestriday) after I left segregation after seeing you. I could not even get "HiviMi Landfair to look me in my eyes or fare when I spoke with her about this incident,"

At my 6/17/21 appointment with Dr Jones - Or Jones Stated "Misedor I have been doing this along time, and I know that Healthcare Staff alway's Retoliate "against people such as yourself, who advocate for necessary medical treatment." Or Jones went on to say "I I've been doing this along time, and I know "Retaliation" when I see it."

I ended up missing my scheduled call-out for "Jef" Low Library on 6/16/2021. This was a direct result of me being placed in segregation within an hour of my call-out lappointment time for the "Jef" law library. At the time, we were only allowed two-Law Library callout dates/times per week, for 1-hour session at a time, our day and time was schooled according to our housing unit location lassingment. I needed copies of pending lawsuit, case No. 2121-cv-11643, to send to the U.S. District court to do my initial filing of the lawsuit, Because of missing my call-out on 6/16/21 for Law

Library, I did not get my "Legal Copies made for almost another week, I ended up sending this lawsuit out in the U.S. mail on or about I week later around 6/23/2021. It did not reach the court's until July, 2021.

"HIVIM" strenng Landfair was well aware, because I made her aware, when I was begging and pleading with her in "JCF" healthcare services Deption Collebal-to please not put me in segregation, that I was not in any way wanting to harm myself, I stressed to "HIVIM!" Landfair that I would miss my call-out to the "JCF" Law Library that I had in less than an hour, I really believe that when I told her about my Law Library call-out that I was going to miss - that she was even more metivated to place we in segregation once she learned that I begged and pleaded with "Hillim." Landfair and nurse Hinda Florek on 6/16/21 - not to place we in segregation, because I am not in any way surcidal, nor have I ever been suicidal since coming to "JCF."

I am not in any way surcidal, nor have I ever been suicidal since coming to "JCF."

I was placed in Segregation on 6/16/21 - as a Deterrent" to stop Filing a maintain of Healthcare "Kites", girevances, and lawsuit's against healthcare staff.

It did not "deter" me one bit, if anything, It made me more determined to

fight for my civil rights and necessary medical treatment.

"How Mi" sirenna Landfair (RN) has made it well known to other staff at "JCF" that she is blased against me, right from the 1st day I arrived at "JCF" on 7/24/19, she has made statement's to not only other healthcare staff , she has also made statement's to Assistant Deputy warden - Tricia kisor on more than one occassion about me and my history of Advocating for adequate medical treatment and protection of my 8th Amendment civil right's against Milioic,", Corizon Health Inc., and staff at other facilities, Other's involved in the Issue of this laws with are of unrelenting kites and greevances I have wrote at other facilities, and also I have wrote at "Jef" between my 7/24/19 arrival and present date. Everybody involved in this lawsuit, all defendants have shown that they are biased against me at one time of another. In one way or another. They have all discriminated against me in one form or another on multiple occassion's jetter during in prison applies) in kite responses, grevance responses if they answered a grevance of mine.
All defendants in this lawsuit have excersized "deliberate Indifference" to my Serious medical needs at one time or another. Either in person, or in my response to a Healthane "Kite" I have sent to Healthcare Depti secking wedleally necessary case and treatment I have suffered physically, emotionally, mentally as a direct result,

I wanted to share some of the times that "HilliMi" Landfair has shown her discrimination and being Brased against me because of my Advocacy of protecting my 8th Amendment civil right's - related to my "ongoing" medical treatment in the past, before coming to "JCF"-and related to my pursuit of necessary medical treatment, while housed at "JCF" between 7/24/19-present.

* Thise statement's were made between my 7/24/19 arrival at "JCF" and leading up to the 6/16/21 incredent where "HiMIMI" Landfair and other defendants in this lawsuit "Retaliated" against me and put me in segregation on a "trumped" up allegation (charge of potential "self Injurious" behavior. The 6/16/21 incident was rediculous to anybody and everybody who knew about it, Both "MIDIDIC," staff and other prisoner's,

The following are relevant statement's made by "JCF" Health unit Manager Streng Landfair (RN) on more than one occassion, she has been "Blased", against me long before the 6/16/21 incident, when a person exhibits being biased against another person it is not that far of a step or reach to follow thro with an act of "Retaliation", It was very obvious that H. U.M. Londfair has not liked me one bit since the day that I arrived at "JCF" on 7/24/19.

- i) on the day I arrived at "JCF" on 7/24/19, during my intake interview with "JCF" nurse in healthcare Dept.! How, in Landfair was present in the nurse's station where I was speaking to the nurse doing my "Intake" interview. I did not know that she was the "Houm," at this point in time.
- Hillimi Londfair stated the following to the nurse, I heard her say thesethings to the nurse myselfi Hillimi" Landfair kinda yelled across the room to the nurse I was speaking to
 - A) He is a known Hunger-striker",
 - (b)" He is known to fall astrep in his wheelchair,"
 - @ After I told the nurse doing my "Intoke" Interview that I have an active need, detail / Accomplation for an "Aide" to assist me with completing most basic daily living needs/task's. "Hou Mi" Landfair interrupted mine and the nurses discussion and soid the following:

 - He does need an "Aide" (after she locked at computer electronic record)
 H.u.M. Landfair then said; she asked me?
 "whois the "H.u.M." at Adrian Correctional facility"? she basically

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.29 Filed 10/26/21 Page 29 of 51

went on to say that she was going to contact the Hillimi at Adrian corr. facility, where I had came from an 1/24/19 - And curse her out for sending me to "JCF" without notifying "JCF" steff of my special medical need for an "Alde" to assist me.

Every Since that day, I have been treated as a "Nuisance" by "JCF" healthcare staff and "H. U.M." sirenna Landfair.

Also, Hillimi Sirenna Landfair has made several comment's to "JCF" Assistant Deputy warden - Tricia kisor about me, ms kisor was at one time a member of my Healthcare "Treatment Team", she participated in the "Treatment Team" meetings with healthcare staff in charge of my medical care at "JCF" upon my arrival at "JCF"—"Hivin," Landfair made comments on several occassion's to ADW-Tricia Kisory about me.

(1) ADW-Tricia kisor told me this horself, in a face to face conversation, ms, kisor told me that "Hillimi" Landfair had told her, when I first arrived at "JCF."

"we may not be able to keep Mr Sedore housed at "JCF" because of his history of grievances and litigation against healthcare stoff at other prison's," The told ADW-ms Kisor, "we don't want to deal with that problem here at "JCF."

(2) on 2/19/2020, I had a chronic core appti w/Or Frederick Herro, During this apptimy assigned "Aide" khalil chahine # 534769 pushed me back to Or Herro's office, He then set down in the chair inside or Herro's office during my "ongoing" appti! After about 15-25 minutes, The Health unit Manager - Sirenna Landfair was walking down the hallway, she passed Or Herro's office and saw me , or Herro, and mr chahine sitting in Or Herro's office, she stopped and told Mr chahine Nyou cannot be in there you must leave now. I told her "He is my "Aide", "she again stated "you must leave mr. chahine". Dr Herro and I did not have any problem with mr. chahine being present in my appti! Actually, I had a need for mr. chahine to be present at my appti with Or Herro, I have a history of multiple Traumatic Brain Injuries, Post Traumatic stress disorder, emotional issues related to "ongring" chronic pain and medical Issues;

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.30 Filed 10/26/21 Page 30 of 51

mr chahine help's me communicate productively because I tend to get frustrated and I am not a good communicator when I speak and deal with Correspondent provider's because I know that money is the main motivator in what medical treatment that I receive, I feel that I am being neglected, mistreated, treatment of my Healthcare treatment.

Anyway's, I needed mi chahine's assistance to communicate with Or Herromy needs and my medical ressues,

HILLIMI Landfair told mi chohine "you must leave, you cannot be in there! So mr chahine left and waited for me to come out to the "JCF" Healthcare

services watting room, once I was done with my apply with or Herro.

within a couple day's of my 2/19/20 appt, with Dr Herro, ms Landfair went to ADW Triesa Kisor and told her about mr chahine being in my 2/19/20 Doctor appt. I she told ADW Kisor to go speak with prisoner chahine. ADW Kisor saw mr chanine in the "JCF" school (300 Building) and pulled him out and spoke with him about his being in Dr Herro's office with me and Dr Herro during my 2/19/20 appti. ADW KISOT told mr. chahine and later told me in passing, during an unnelated discussion—that when "Hillim!" Landfair saw mr. chahine in my Doctor appt, with Or Herro—that she get very panicked I nervous because of my past history of grievances and livingation against Healthcare staff at other facilities.

ADW KISCT basically stated to Mr chahine during that conversation, and to myself on a different day when we were talking in passing - that "Humillondfair got very panicked and nervous when she saw mr chahine in Coctor Herro's office with me at my 2/19/20 appti because then I would have a "witness" to whatever was discussed between me and or Herro at that appt, I with my

history of litigation, ms Landfair became nervous/panicked,

ADW KISOr told us that "How, M." Landfair did not want Mr. Chahine to ever go into one of my Doctor apphis again, she did make it well known that "Hivi.Mi" Landfair had sent her to speak with presoner chahine after

my 2/19/20 Drappt! H. u.M. Landfair and other defendants in this lawsuit are well aware of my healthcare kites, my numerous grievance's, past and "ongoing" federal civil litigation over my medical treatment inside the "MiDioici".
They based all decision's to "Retaliate" against me on 6/16/21 on those facts, and they decided to put me in segregation on a "Trumped-up" Dallegation of "self-Harm" / "self-Injurious" behavior that never happened. The whole allegation was a bunch of crap , in defendant's attempt to scare or Deter me from persuing future kite's, grievance's, litigation against anybody at "JCF," It did not work, I won't be "Deterred". It made me more determined and committed to fight for my civil right's. The only thing that can deter me from my current path is for medical staff to either treat my "ongoing" pain or "underlying" orthopedic and other medical issues that affect every aspect of my life 24/17-365 day's a year.

I suffered physical pain, emotional and mental Anguish as a direct result of the treatment and claim's in this lawsuit, I suffered Harrassement, discrimination, embarrassement, humiliation, anxiety, and "Retal ration" on 6/16/21, because of this incident. It also caused me a short delay in filing a lawsuit (case No. 2/21-cu-11643) against these and other defendants at "JCF" over "ongoing" Orliberate Indifference to my serrous medical needs,

The incident on GILDI was not any coincidence, of an accident. It was also not merely poor judgement. It was a "deliberate" act of "Rotalia Non" to deter me, This was a collaborative effort by any lall defendants in this law suit, "Hillim" strenna Landfair was definately the lead instigator, but all defendants played a very important and real role in this "Retaliation". They are all guilty of violating my 1st Amendment civil Rights. Also violated is Title II of the American's w/ disabilities and Rehabilitation Acts.

I swear under Penalty of Person that any lall afforements one accurate and truthful, hespectfully Submitted,

Printed name: Scott Sectore #210661 Signed name: Scott Sectore #210661 Date: 10/26/2021

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.32 Filed 10/26/21 Page 32 of 51

"Relief Sought"

where Plaintiff respectfully pray's that this Court:

- A) Declare the Act's and omission's described herein violated Plaintiff's right's under the Constitution and Law's of the united States.
- B) Declare that the Michigan Department of correction's has Violated Title II of the American's w/ Disabilities and Rehabilitation Acts.
- © order that the Michigan Department of correction's Stop violating the American's w/ Olsabilities and Rehabilitation Acts.
- Damages,
- @ order "Each" Defendant to pay \$ 250,000 in Punitive Damages.
- (F) order the Defendant's to pay reasonable attorney fee's and Cost's.
- 9 grant any other Just and equitable relief that this court deem necessary,

I swear under Penalty of Ferjury that any lall statement's Above are Accurate and Truthful.

Respectfully Submitted,
printed name: Scott Sedore # 210661
Signed name: Scott Secon # 210661
Date: 10/26/2021

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.33 Filed 10/26/21 Page 33 of 51 "Index" of Exhibits

- 1) Healthcare "Kite" I sent to "JCF" Healthcare 6/15/21 (1-page)
- @ 5/19/2021 Blood Test results (2-pages)
- (3) grievance # JCF/2106/1026/28I (Gpages)
- (4) "Receipt" dated 7/21/2021 sent grievance to step#3
- (5) medication Information sheet (Lyrica) (2-pages)
- (6) 6/16/2021 "Kite" response for Exhibit #1 (1-page)
- (1) "Roberta R Referral" report Authored by Psychologist - Dr Alison W. Jones (PHd) (3-pages)

	4835-7549
CHIGAN DEPARTMENT OF CORRECTIONS-Bureau of Health Care	CHJ-549 11/05
EALTH CARE REQUEST (Attail 1) VICTOCIA Hollett	
PRISONER: COMPLETE SECTIONS A THROUGH-D	
NAME: Scott Seclore FACILITY:	JCF
NUMBER: 21046/ LOCK: B-/ DATE: 6/19/1	214 change
This Health Care Request is for the following (check one or more): Health Record Copies Nor	1-urgent this kite
Dental Medication Refill Medical Doptometry Mental Health Urg	ent Switsed
I have the following problems/symptoms: I talked to you on the phase to Ja	y DI Holle
un mentioned That my 5/18/21 Rload test results show	want wery
I low platelet counts, you asked me why that would E	Pa what I
The doug different That could could That?	
I think I found out what was causing that problem	Ithink
it was the "Lyning" that I was taking. I water dozen's	· / / /
NOTICE TO PRISONER Specifically addressed to you while I was to	King Lyfix
You will not be denied health care services for lack of personal funds. However, if your account does not have adequa	ite funds, the
opayment will be considered an institutional debt and shall be collected as set forth in PD 04.02.105, "Prisoner Funds"	-anterfed a
igning this document formally requests treatment. In addition, it authorizes the DOC to treat or arrange treatment for ny necessary medical information to facilitate that treatment, to review treatment, to respond to a related grievance, or	you and to release
ppeal you may make regarding the Department's decision to charge for the care.	100
is called me out desing this time, that's why stopped laking lyou	ra, nobody
have read Section D above, or it has been read to me and I understand that I will be charged \$5.00 for my health care or one of the reasons lived below in Section F. If I am charged for this visit, I agree that the \$5.00 may be taken-from	visit unless it is
would my claim of side Entity	
Prisoner Signature: Scott Sullow Prisoner: DO NOT WRITE BELOW THIS LINE Know the	
TUT WAS ALVANDED	Lylles
INSTRUCTIONS TO PRISONER projectly caused this projectly	poperwal
That sent with the kine, I highlighted in side of	tid way
experiencing white laking "Lyrice", 1518 13 hot all 12	15ldretter
I execused though,	
Act 11 H - where contact DI schmidt (RMD) III BI	rls man
An appointment has been scheduled for you on: Date: Date:	1/ My
4////oved 70/ 140	1/10/16/10/14
11/- 0	100
COPATIVIENT (to be fined out by house case). (1)	115/20,
Note: If none of the exceptions listed below apply, check the box below and a copay will be charged. * requested by a QHP (includes transfer assessments, chronic care clinics, intake and annual screen	ning /3
and required follow-up care)	12/23/20
for injuries that are work-related as documented by the prisoner's work supervisor	enry tord
requested for testing for HIV, STD's, infestations, or reportable communicable diseases requested for evaluation, consultation, or treatment of a mental health need	2018
• prompted by a medical emergency (see Section I of the policy, if self-inflicted)	1/
I have reviewed the visit of and certify none of these exceptions apply. ###	9691121
Signature: Title: Provider #: Date	e:
Distribution: White - Health Services, Canary - Prisoner, Pink - Business Office	

EXHIBIT" # 1



Department of Corrections Lab Report

Offender Name: SEDORE, SCOTT LEE

Date of Birth: Report Date:

07/19/1967 **05/19/2021**

Sex: M

Provider: YARID, RAVI

Off #:

0210661

Report Date: 05/19/2021	Provider: YARID, RAVI	
Test Name	Lab	Collection Date Results Date
	Result	Reference Range
COMMENTS:		05/18/2021 16:00 05/1 9/2021 08:39
CRP (NON CARDIAC) (CRPNC)		
CRP (NON CARDIAC)	0.5 (N)	0-1.0 mg/dL
CBC {CBC2}		05/18/2021 16:00 05/1 9/2021 08:39
PLATELET COUNT	(102 (L)	140-400 TH/CUMM
WHITE BLOOD COUNT	4.17 (N)	4.0-10.0 TH/CU MM
ABSOLUTE NEUTROPHIL CT	2.50 (N)	1.56-8.10 x10-3/uL
NEUTROPHILS	60.1 (N)	39-81 %
LYMPHOCYTE	24.2 (N)	14-51 %
MONOCYTES	12.2 (N)	0-13.3 %
EOSINOPHIL	2.6 (N)	0-8 %
BASOPHILS	0.7 (N)	0-2 %
RED BLOOD CELLS	4.48 (N)	4.41-5.51 M/CU MM
HEMOGLOBIN	13.8 (N)	13.5-17.5 G/DL
HEMATOCRIT	41.8 (N)	41-53 %
MCV	93.3 (N)	80-100 FL
MCH	30.8 (N)	27-33 PG
MCHC	33.0 (N)	31-37 G/DL
RDW	12.1 (N)	11.0-14.5 %
MPV	12.9 (H)	7.4-12.0 FL
CMP {CMP}		*05/18/2021 16:00 05/19/2021 08:39
ALBUMIN	4.6 (N)	3.5-5.5 G/DL
ALK PHOS	49 (L)	53-128 U/L
TOTAL BILIRUBIN	0.6 (N)	0.2-1.2 MG/DL
BUN	8 (N)	7-18 MG/DL
CALCIUM	9.4 (N)	8.4-10.7 MG/DL
CHLORIDE	108 (H)	98-107 MEQ/L
CREATININE, SERUM	0.84 (N)	0.7-1.3 MG/DL
GFR (NON-AFR AMER)	102 (N)	60-300 mL/MIN
GFR (AFR AMER)	123 (N)	60-300 mL/MIN
GLUCOSE	78 (N)	70-105 MG/DL

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.36 Filed 10/26/21 Page 36 of 51

Offender Name: SEDORE, SCOTT LEE

07/19/1967

Sex: M

Off #:

0210661

Date of Birth: Report Date:

05/19/2021

Provider: YARID, RAVI

r rovidor. Tritab, r	0.141
REFERENCE RANGES FASTING DRAW: 70-105 mg/ RANDOM DRAW: DEPENDEN 4.1 (N)	dI NT UPON TIME AND CONTENT OF LAST MEAL 3.5-5.1 MEQ/L
6.8 (N)	6.0-8.3 G/DL
146 (H)	136-145 MEQ/L
31 (N)	22-33 MEQ/L
28 (N)	15-40 U/L
30 (N)	7-45 U/L
	05/18/2021 16:00
2.109 (N)	0.465-4.68 uU/mL
0.62 (L)	0.78-2.19 ng/dL
1.184 (N)	0.970-1.69 NG/ML
	05/18/2021 16:00
1.9 (N)	1.6-2.55 MG/DL
	REFERENCE RANGES FASTING DRAW: 70-105 mg/ RANDOM DRAW: DEPENDEN 4.1 (N) 6.8 (N) 146 (H) 31 (N) 28 (N) 30 (N) 2.109 (N) 0.62 (L) 1.184 (N)

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PagetD:37 Filed 10/26/21 Page 37 of 51

"Exhibit #3"

MICHIGAN DEPARTMENT OF CORRECTIONS PRISONER/PAROLEE GRIEVANCE FORM

4835-4247 10/94 CSJ-247A

Date Received at Step I	Grievance Ide	entifier: $[J_1C_1F_12_1]O_1$	6 1026 285
Belliefat and voncise in de proceedings setter to Park	ត្រូវក្សារាជ្រស់ស្ពារ ខ្មែរទ្រឹងរាច់ខ្មែរក្រុម ស្រីស្រីស្រី ស្រីស្រី ស្រីស្រីស្រីស្រីស្រី	an inconson caw biordry.	
Name (print first, last) 5 cott Sedore	1 - · · · · · · · · · · · · · · · · · ·	Institution Lock Number B-1	Date of Incident Today's Date 6/18/2021
What attempt did you make t	to resolve this issue prior to writing the form the people invo	g this grievance? On what of	late? on 6/16/21 I spoke this givenance, I spoke
of thes grevance ore or victoria Hallett (no State problem clearly. Use st	as follows! Michigan) Health unit Manager (" eparate grievance form for each is	Dept, of corrections Tem)—H. u.M. Siren usue. Additional pages, using	ple in volved in the 155ue ("M.D.O.C."), Conzen Health, no Landfar (RN), Branstrick II g plain paper, may be used. (RN e grievance must be submitted.
1 Our copies of each page and	cupper wing we construct the construction of t	· 1	$ \sim$ \sim \sim \sim \sim \sim \sim \sim \sim \sim
his caused/affected me wind list at this point. I will name at this point, I will name titles, employers, Job's as the	the physical pain jemotion may be other s involved in them as (Jane / John)	ionaland mental Anglithe 1554e of this gill Does at this fount in	ed of this gill vance was not ed in Jef" Healthcare staff the resolved despite my fleats to many way's too may way's too may way's too may way same that am not aware that a will furnish name time. I will furnish name time. I will furnish name time.
The iscue of this of	verance involves the folle	sung 1st Amendmen	teers. It involves more than m
103,03,130, 1003,04,100 nd rehabilitation Acts Als F Deportment policies as we	Phoyob, 160 Also Vice Violated is Midio, e.C	lations of Title I of PDO1,04, 110 (Pg.1) to carry out these Po Dendored it in a scale	olicy Directives in 102,031 to 5 The Americans wolfsability The Americans wolfsability The Americans wolf and wrotehern olicies" (BHCS). I had spec I multiple madrial issues be had extremely low Platele Scott Sedore Wirievant's Signature Kete and con of a non-phile
on 6/15/21 I wrote !! I tho top of the "Kite" - I her on the telephone between the flat months and that in	And I sent it to the "Jet" in Jef-BH (Sand my hour of 5/18/21 Blood test res	is Bureau of Healthcar ing unit. we discussed with showed that I	I multiple madrial issues be had extremely low Platele Scott Sedares
Hallett mentsoned that net elects are what makes me RESPONSE (Grievant Inter		-	resolved, explain resolution.)
Respondent's Signature	Date	Reviewer's Signature	Date
Respondent's Name (Print)	Working Title	Reviewer's Name (Print)	Working Title
	resolved at Step I, Grievant sign here esolution must be described above.	e. Grievant's Signature	Date

Process to Sten One: Goldenrod - Grievant

After Dr Hallett toldme on Gliski, that my "Platelet's" were very low, I pulled a copy of this pauphlet ait of my footlocker - describing uses and known side - effects of a medication that recently had stepped taking because I was experiencing extreme, severe, Agonizing, Life attering side-effects. The name of this medication was /Is "Lyrice". The story behind that and me stopping taking it is a who he seperate story, I will include and explain at a later relevant time and clate.

In this pamphlet about "Lyrica" It stated that in rare cases - Lyrica has been known to cause extreme low platelet counts. I write a "kite" (specifically addressed to Or Hallett), I enclose it in a citer envelope, and address the envelope also to Or Hallett! I explain inside on the pamphlet, that I had effect out-myself" over I-week prior, and that I had bled for several hours uncontrollably. I did not state cut-myself" over I-week prior, and that I had bled for several hours uncontrollably. I had did it on that it was my foot Theel - As I did not feel that it was relevant. I never stated that I had did it on that it was my foot Theel - As I did not feel that it was relevant. I never stated that I had did it is not not to the pamphlet with uncontrollable bleeding and the other wanted to hait myself. I only wanted to relay my experience with uncontrollable bleeding armose, of the I wanted to huit myself. I only wanted to relay my experience with uncontrollable bleeding arpose, of that I wanted to hait myself. I only wanted to relay my experience with uncontrollable bleeding arpose, of that I wanted to hait myself. I had low Block platelet's count's, I wanted or Hallett row that would explain that incident, if I had low Block platelet's count's, I wanted or Hallett oknow that I had experienced this first hand, as a sign to verity when she told me my low Block lotter offset and Aland clothing ability. latelet's affected my Blood clothing ability.

Anyway's JCF Healthcare staff-"HillMi"strenna Landfait (RN), nating Supervisor Brian Hickin (RN), Dr Hallett (DD), and nurse Alinda Florek (RN) have me called overto JCF Healthcare rusces Bldg. at approx, 12:45 pimi on 6/16/2021, when I'm taken to the nurses station-Hillim, indfair, nurse Bran stricklin, and nerse Alinda florek accuse me of being suicidal and tryingto arm myself, no place did I ever verbally tell anybody of tell anybody in my kite - that I was arcidal and wanting to presently, or in the past harm myself in anyway. They authored and aneto those Bright Ideal's an there own - despite my pleas trying to tell them that I don't want to

uit myself, nor had I ever tried to hurt myself ever in the past,

In the end, these individual's involved in the issue of this grievance had me handcuffed and aken out of Healthcare services in mywhielchair, taken to L-unit (segregation)—where I sat for ours, causing me severy, extreme poin and suffering. I placed on a psychiatric Hold-until Dr ones (psychologist)—"PHO" came and assessed me for suicide risk, please Refer to Dr. Jones. : port Dictation from the G116/2021 "Roberta R. Referral," she basically states that it is idiculous what was did to me by those I named in this grievance. That It was untounded and basically an act of revenge and retalliation. That at no time was there everany suicide claims mode by me,

I suffered in physical exscrutating poin remotional, mental Anguish, I was treated as a nuisance, I was embarrased, humilitated, angry for being treated like that, I was low hibrary call-out for Legal research for pending litigation, my call-out was scheduled from 11:30-2130pm, that I missed because I was in segregation,

House Landfair and those involved in the issues made comment's about "kites", grevances, lawsuits/ litigation as I was talking to them in the BHCS, I had just

settled a lawsuit (case No. 4,19-cv-10259) on 6/4/2021.

This whole incredent was well planned by all involved in greene/issue, I was the viction of "Retaliation", "Deliberate Indifference" - One to post "kites", grievences, litigation that I have wrote or filed since coming to "JCF" or 7/24/19 and betor at other facilities,

Dany Institutional transfer after this givenance is filed will be interpretted as an act of further Retaliation , (6/18/2021) Scott Seeby # 210661

Mich igan Department of Corrections FIRST STEP GRIEVANCE RECEIPT

DATE:

6/21/2021

TO:

SEDORE

210661

LOCATION: JCF

B-1

FROM:

Grievance Coordinator: Cobb

SUBJECT: Receipt for Step I Grievance

Grievance Identifier:

JCF

2021 /

06 / 1026

Failed to attempt/resolve issue W/ STAFF INVOLVED y

Received:

Issue:

6/21/2021

Date Due:

7/12/2021

Your Step I grievance was received as indicated above. You should receive a response no later than the due date listed above. If you have not received a response by this date and no extension has been given, you may submit a written request for an appeal form to this office. You will need to note, on your request, the grievance identifier as listed above.

Michigan Department of Corrections **GRIEVANCE REJECTION LETTER**

DATE:

6/21/2021

TO:

SEDORE

210661

LOCATION: JCF

B-1

FRO M:

Grievance Coordinator: Cobb

SUBJECT: Receipt/Rejection/Denial for Step I Grievance

Your Step I grievance regarding Failed to attempt/resolve issue W/STAFF INVOLVED and was rejected due to the following reason: was received in this office on 6/21/2021 The grievant did not attempt to resolve the issue with the staff member involved prior to filing the

grievance unless prevented by circumstances beyond his/her control of if the issue falls within the juris diction of the Internal Affairs Division in Operations Support Administration.

Any future references to this grievance should utilize this identifier:

2021 / 06 / 1026 / 281 **JCF**

Respondent

G. Robert Cotton Correctional Facility

Step II Grievance Response

Grievant: Sedore # 210661

Grievance #: JCF-2021-06-1026-28I

I have reviewed the Step I grievance, Step I response along with the associated Step II reason for appeal. The Step I grievance was rejected for the complaint being filed on a non-grievable issue. At Step II you dispute the rejection.

Grievance Rejected

PD 03.02.130 "Prisoner/Parolee Grievances" defines what is grievable and non-grievable. The grievant failed to attempt to resolve the issue with staff member. The grievance shall not be rejected if there is a valid reason for the delay; e.g. transfer.

The step I rejection has been reviewed by the Warden's office in accordance with P.D. 03.02.130 "Prisoner/Parolee Grievances" and the **REJECTION IS UPHELD AT STEP II**

Noah Nagy, Warden

Respondent's Name/Position

Respondent's Signature

MICHIGAN DEPARTMENT OF CORRECTIONS

PRISONER/PAROLEE GRIEVANCE APPEAL FORM

4835-4248 5/09 CSJ-247B

Date Received by Grievance Coordinator at Step II:	Grievance Identifier:	TCFANO6	11026	28I
INSTRUCTIONS: THIS FORM IS ONLY TO BE USE The white copy of the Prisoner/Parolee Grievance with a Step I response in a timely manner) MUST II and Step III.	Form CS1-247A (or the o	oldenrod conv.if ve	ou have not been pif you appeal it at	provided both Step
If you should decide to appeal the Step I grievance byby	response to Step II, your a If it is not submitted b	appeal should be dir by this date, it will I	ected to: pe considered tern	ninated.
If you should decide to appeal the response you re Office, P.O. Box 30003, Lansing, Michigan, 48909	eceive at Step II, you sho	ould send your Step	III Appeal to the	Director's
Name (Print first, last) Scott Sedore A 1060	Institution JCF	0-1 6	116/2021 1 1	9y's Date 25/2021
of my 6/16/21 attempt, while I was face to face and pleaded with them for a different out come,	osletous, judicious, and I found in the ses in person with thoses The actions of those be	nd ridriculous to different areas of erng grieved. I erng grieved mee	Saythat I tailed My of Evance us spoke to them in f t all the eleme	to attempt to there I spoke Person, I begged ents of all my
claims in my glievance, especially the Retaliation All claims and issues from my step#1 gilevand those involved in this issue offered no resusa simple " Dead-End" There is an "available" as	on claim, The whole ince carry over to mu olution of any type or In inistrative remede	issue is harrosen step#2 gilevan form, The M.O. to Exhaust Tan	nent and Retali ce appeal, The gl o.c., grievance fl met required un	ation - tevance (adding socess operates der M.D.O.C.
STEP II — Reason for Appeal It is totally propressive we staff involved in the issue being grieve of my 6/14/21 attempt, while I was face to face and pleaded with them for a different outcome, claims in my grievance, especially the Aetaliation All claims and issues from my step #1 grievand those involved in this issue offered no resus as a simple "Dead-End" There is no "available" as 1003;02:130 to exhaust "un available" remedie procedures. They never follow PD 03,02:130, It exhausted any available administrative remedie by ducoff, coffee thm, 380 f, 3d 989 — Aoss V, E	is The M. D.O. C. never is Simply a Dog and po s. please refer to the blake , 1368, cti 185	follow's and Engshow Achar following: Rish	rade of solts, erv, Lappin 639	policies and Thouse F, 3d 236) to Address
STEP II — Response			Date Received b Step II Respond	y 7413
Respondent's Name (Print) Respondent's And not receive any step#2 Appendes pense on the step step step step step step step ste	San H : Blade WA - A 1 4	Date 1 1001 43	Date Returned to Grievant:	
istep#3 Appeal, no resolution has ever been affered, this issue and my claims, none of my claims or Divice givening process by any book, at any	The grewine priess 1554es was ever ada	has simply acte dressed or loves	d step #2 App d, playedouta Mg. ted at any	ice to step#3 Affice to a reproduction of a reproduction stage of the
he detendante took advise action against me,	(3) there is a casua	Connection be	ngased in protec	"Retaliation" ted conduct, elements, the
NOTE: Only a copy of this appeal and the STEP III — Director's Response is attached a	response will be ret	urned to you.	duela action wa	stakenat
DISTRIBUTION: White - Process to Step III; Gree		1 727	reat the patec ovy all plem enrod - Grievant	ted conduction

MICHIGAN DEPARTMENT OF CORRECTIONS CAR-100 4835-1100 DISBURSEMENT AUTHORIZATION/CATALOG ORDER FORM 10/08 Prisoners write clearly-illegible/incomplete forms will not be processed. (Date:) Prisoner Number: Prisoner's Last Name: Lock Number: Institution: JCF" cotton 210661 rector's office - P.O. Box 30003 Cost/Amount Address: Reason/Description: (If to relative, identify relationship) Step#3 grievance Appea COMPLETE THIS PORTION FOR CATALOG ORDERS ONLY Page Description of Item Catalog Color Size Qty Unit Price Total Price No. Number \$ \$ Allevance JCF/2106/1026/28I JUL 22 2021 Sub-Total **Delivery Costs** Tax (if applicable) Total Amount Enclosed Deputy Warden or Authorized Agent Date Warden or Authorized Agent Date

Filed 10/26/21 Page 43 of 51

Batch Number

Actual Expense

Code

Case 2:21-cv-12623-GAD-KGA ECF No. 1

0210661 - SEDORE, SCOTT - 52050456 - JCF

Read this medicine information sheet carefully each time you get this medicine filled. You must carefully read the "Consumer Information Use and Disclaimer" below in order to understand and correctly use this information. This information is for MALE patients only. It does NOT include important information for FEMALE patients.

Pregabalin Capsules

Pronunciation (pre GAB a lin)
Brand Names: US Lyrica.

What is this drug used for?

- · It is used to help control certain kinds of seizures.
- · It is used to treat painful nerve diseases.
- · It is used to treat fibromyalgia.
- It may be given to you for other reasons. Talk with the doctor.

What do I need to tell my doctor BEFORE I take this drug?

- If you are allergic to this drug; any part of this drug; or any other drugs, foods, or substances. Tell your doctor about the allergy and what signs you had.
- If you have kidney disease.

This is not a list of all drugs or health problems that interact with this drug.

Tell your doctor and pharmacist about all of your drugs (prescription or OTC, natural products, vitamins) and health problems. You must check to make sure that it is safe for you to take this drug with all of your drugs and health problems. Do not start, stop, or change the dose of any drug without checking with your doctor.

What are some things I need to know or do while I take this drug?

- Tell all of your health care providers that you take this drug. This includes your doctors, nurses, pharmacists, and dentists.
- Avoid driving and doing other tasks or actions that call for you to be alert or have clear eyesight until you see how this drug affects you.
- Do not stop taking this drug all of a sudden without calling your doctor. You may have a greater risk of side effects. If you need to stop this drug, you will want to slowly stop it as ordered by your doctor.
- · Avoid drinking alcohol while taking this drug.
- Talk with your doctor before you use marijuana, other forms of cannabis, or prescription or OTC drugs that may slow your actions.
- A very bad reaction called angioedema has happened with this drug. Sometimes, this may be life-threatening. Signs may include swelling of the hands, face, lips, eyes, tongue, or throat; trouble breathing; trouble swallowing; or unusual hoarseness. Get medical help right away if you have any of these signs.
- Severe breathing problems have happened with this drug in people taking certain other drugs (like opioid

- pain drugs). This has also happened in people who already have lung or breathing problems. The risk may also be greater in people who are older than 65. Sometimes, breathing problems have been deadly. If you have questions, talk with the doctor.
- If you are 65 or older, use this drug with care. You could have more side effects.
- Talk with your doctor if you plan to father a child. This
 drug made male animals less fertile and caused sperm
 changes. Birth defects also happened in the young of
 male animals treated with this drug. It is not known if
 these problems happen in humans.

What are some side effects that I need to call my doctor about right away?

WARNING/CAUTION: Even though it may be rare, some people may have very bad and sometimes deadly side effects when taking a drug. Tell your doctor or get medical help right away if you have any of the following signs or symptoms that may be related to a very bad side effect:

- Signs of an allergic reaction, like rash; hives; itching; red, swollen, blistered, or peeling skin with or without fever; wheezing; tightness in the chest or throat; trouble breathing, swallowing, or talking; unusual hoarseness; or swelling of the mouth, face, lips, tongue, or throat.
- · Change in eyesight.
- · Muscle pain or weakness.
- · If seizures are new or worse after starting this drug.
- Change in balance.
- · Feeling confused.
- · Shakiness.
- Trouble breathing, slow breathing, or shallow breathing.
- Change in color of skin to a bluish color like on the lips, nail beds, fingers, or toes.
- · Memory problems or loss.
- Shortness of breath, a big weight gain, or swelling in the arms or legs.
- · Fast or abnormal heartbeat.
- · Fever, chills, or sore throat.
- · Skin sores.
- Trouble speaking.
- · Trouble sleeping.

0210661 - SEDORE, SCOTT - 52050456 - JCF

- · Trouble walking.
- · Feeling high (easy laughing and feeling good).
- · Twitching.
- Get medical help right away if you feel very sleepy, very dizzy, or if you pass out. Caregivers or others need to get medical help right away if the patient does not respond, does not answer or react like normal, or will not wake up.
- Patients who take this drug may be at a greater risk
 of having thoughts or actions of suicide. The risk may
 be greater in people who have had these thoughts
 or actions in the past. Call the doctor right away
 if signs like low mood (depression), nervousness,
 restlessness, grouchiness, panic attacks, or changes
 in mood or actions are new or worse. Call the doctor
 right away if any thoughts or actions of suicide occur.

Low platelet counts have rarely happened with this drug. This may lead to a higher chance of bleeding. Call your doctor right away if you have any unexplained bruising or bleeding.

What are some other side effects of this drug?

All drugs may cause side effects. However, many people have no side effects or only have minor side effects. Call your doctor or get medical help if any of these side effects or any other side effects bother you or do not go away:

- · Feeling dizzy, sleepy, tired, or weak.
- · Weight gain.
- · Not able to focus.
- · Headache.
- · Dry mouth.
- · Constipation.
- · More hungry.
- · Upset stomach.
- · Joint pain.
- · Nose or throat irritation.

These are not all of the side effects that may occur. If you have questions about side effects, call your doctor. Call your doctor for medical advice about side effects. You may report side effects to the FDA at 1-800-332-1088. You may also report side effects at https://www.fda.gov/medwatch.

How is this drug best taken?

Use this drug as ordered by your doctor. Read all information given to you. Follow all instructions closely.

- · Take with or without food.
- Keep taking this drug as you have been told by your doctor or other health care provider, even if you feel well.

What do I do if I miss a dose?

- · Take a missed dose as soon as you thirnk about it.
- If it is close to the time for your next dose, skip the missed dose and go back to your normal time.
- Do not take 2 doses at the same time or extra doses.

How do I store and/or throw out this drug?

- · Store in the original container at room temperature.
- · Store in a dry place. Do not store in a bathroom.
- Store this drug in a safe place where children cannot see or reach it, and where other people cannot get to it. A locked box or area may help keep this drug safe. Keep all drugs away from pets.
- Throw away unused or expired drugs. Do not flush down a toilet or pour down a drain unless you are told to do so. Check with your pharmacist if you have questions about the best way to throw out drugs.
 There may be drug take-back programs in your area.

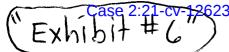
General drug facts

- If your symptoms or health problems do not get better or if they become worse, call your doctor.
- Do not share your drugs with others and do not take anyone else's drugs.
- This drug comes with an extra patient fact sheet called a Medication Guide. Read it with care. Read it again each time this drug is refilled. If you have any questions about this drug, please talk with the doctor, pharmacist, or other health care provider.
- If you think there has been an overdose, call your poison control center or get medical care right away.
 Be ready to tell or show what was taken, how much, and when it happened.

Consumer Information Use and Disclaimer

This information should not be used to decide whether or not to take this medicine or any other medicine. Only the healthcare provider has the knowledge and training to decide which medicines are right for a specific patient. This information does not endorse any medicine as safe, effective, or approved for treating any patient or health condition. This is only a brief summary of general information about this medicine. It does NOT include all information about the possible uses, directions, warnings, precautions, interactions, adverse effects, or risks that may apply to this medicine. This information is not specific medical advice and does not replace information you receive from the healthcare provider. You must talk with the healthcare provider for complete information about the risks and benefits of using this medicine.

Issue Date: 02/03/2021
Database Edition 21.1.1.002
Copyright 2021 Wolters Kluwer UpToDate,
Inc. and/or its affiliates. All Rights Reserved.



12623-GAD-KGA ECF No. 1, PageID.46 Filed 10/26/21 Page 46 of 51

Michigan Department of Corrections
Kite Response

Offender #: 0210661

Offender Name: SEDORE, SCOTT LEE

Location: JCF - G. ROBERT COTTON CORRECTIONAL

Lock: B:01:Bot:L

Discipline:

Medical

Received Date:

06/16/2021

Initiated Date:

06/16/2021

Taken By:

Florek, Alinda [AF10] RN

Request Type:

Medical Question

Request Summary:

Please see kite dated 6/14/21 regarding platelet count and cutting self.

Plan/Action:

Pt placed in segregation unit with a psych referral completed for self-injurious behavior.

Comments:

* That is ridiculous- I had a week old scrape on the back of the
Heel of my right foot. I cannot even
Bendover and reach my foot due
to chronic pain , orthopedic issues,
- That is why I have an assigned "Aide"
to Assist me with Advirtres of Daily living
("ADL's)

Exhibit Page 47 of 51 -------

0210661

Michigan Department of Corrections

ROBERTA-R Referral

Offender Name: SEDORE, SCOTT LEE

Date of Birth: 07/19/1967 Date:

06/16/2021 14:24

Off #: М

Sex: Facility: JCF Provider: Jones, Alison W. [AJ7]

Level of Care: OPT - V

Barriers to Communication

Please document what means of communication were utilized during encounter
(CHECK ALL THAT APPLY):
XNo barrier to communication present.
1. ASL with video relay interpreter (VRI) - DHH
2. ASL with in-person interpreter - DHH
3. Lip reading - DHH
4. Speaking Loudly - DHH
5. Hearing aids worn - DHH
6. Written Slate DHH
7. Communication Boards DHH/Other
8. Clear mask worn by QHP - DHH
9. Additional staff brought in to assist with communication DHH/VI/Other
10. QHP read handouts or brochures VI/Other
11. Other (face-to-face or maintained eye contact) DHH/Other
Prisoner Acknowledgement of communication being effective:
(CHECK ALL THAT APPLY):
X1.Verbally acknowledges communication was effective
2. Responded and/or asked appropriate questions
3. Repeated or rephrased information give
4. Unable to achieve effective communication need to reschedule

DHH = Deaf and/or Hard of Hearing VI = Visually Impaired Other = Cognitive/Mental Impaired

ROBERTA-R

R easoning

O rientation

B ehavior

E motion

R ecall/Memory

T alk

A ppearance

R elationships

Reason for Referral

Mr. Sedore was seen on this date pursuant to this clinician receiving communication from the psyc secretary indicating that one of my clients had been taken from health care to the cage in L unit and would be needing to see mental health. When this clinician contacted L unit they confirmed that he was in the cage awaiting speaking with mental health, but were unsure of the circumstances. Due to wanting to clarify the specific concern this clinician contacted nursing and spoke with the HUM who indicated that he had put in a kite stating that he had cut himself on his heel and had bled profusely. She indicated that the cut occurred approximately a week ago. She notes that his kite was written on 6-14-2021. A Roberta R had been written by nursing staff and this clinician was given a copy of that document. It appeared that they were trying to insure that this was not an episode of deliberate self harm and his mental status was normal.

Desired Action

During our interview Mr. Sedore indicated that he was doing just fine and explained the circumstances surrounding his having been placed in the cage. He explained that he had seen his medical provider yesterday and had been told that his platelets were quite low and that it was unclear about why this was. He had advised that he had been taking Lyrica but had stopped his meds upon feeling that they were not helpful to him. He also states that he read up on Lyrica from

М

Offender Name: SEDORE, SCOTT LEE

Date of Birth: 07/19/1967

06/16/2021 14:24

Sex:

Off #:

0210661

Provider:

Facility: JCF

Level of Care: OPT - V

Date:

Jones, Alison W. [AJ7]

the drug insert document and found out that Lyrica could cause low platelets, which in turn could interfere with his blood clotting properly. He indicates that about a week ago, the back of his heel was cut on his wheel chair due to friction from his skin rubbing against his shoe due to him not wearing socks at the time. He notes that he bled for several hours from this cut. He reports his sense that the reason he bled so much was due to his low platelets which interfere with proper clotting. He reports that following his conversation with his MP and reading the information about Lyrica he wrote a kite to his MP stating that he had last week cut his heel and bled, and this coupled with the Lyrica was most likely the cause of his platelets being so low. He notes that he attached the Lyrica insert to his kite intending for this information to be given to his MP as an explanation for why his platelets could have been low. He reports that he has never intentionally tried to harm himself and he was instead wanting to do things to help himself so that he could live a better and improved quality of life. He showed this clinician the scab that had formed towards the back of his heel from unintentionally cutting himself on his wheelchair. He was adamant in denying any attempt at self injurious behavior, suicidal ideation or intent and instead affirmed that he wanted to get better and stronger so that he could pursue standing up for himself and fighting the injustices that he felt were occurring in this setting. He indicates his sense that he has been retaliated against, repeatedly, for filing complaints and lawsuits and feels that being put in the cage is yet another example of the same. He expressed being very upset about not being able to go to his law library callout in light of them setting limits on his time there due to the instability in the institution coupled with limitations posed due to the Covid pandemic. He stated that if he was unable to get there today he would have to wait yet another week to follow up on his legal work/matters. He indicated further that since he has renewed his efforts to challenge injustices he has been eating more and better, and trying to get stronger.

Client was pleasant and cooperative during our encounter. He was upset about having been placed in the cage, in light of having a law library callout at this time and feeling that this episode could have been managed differently. He was future oriented in his thinking and planning ahead for things that he wants to do to pursue his goals. His mood was euthymic and he was able to explain his situation very clearly and plainly. He continues to advocate for himself in terms of having his needs addressed. He is someone who has struggled a great deal with pervasive pain and discomfort in light of the injuries sustained over the years, and he has worked hard to try to receive treatment, including medication that helps him with his pain. He was advised that this clinician would call him out again tomorrow to continue talking about his situation and to problem solve regarding finding ways to help him to manage his dilemmas. This clinician documented in the log book and advised staff that he was being released back into population at this time.

Current Mental Status

Level of Consciousness: Alert and Oriented

Psychomotor Activity: Normal General Appearance: Normal

Behavior: Cooperative

Mood: Appropriate to Content

Thought Process: Appropriate Thought Content: Normal

Co-Pay Required:

Nο

Cosign Required: No

Telephone/Verbal Order:

No

Standing Order:

No

Completed by Jones, Alison W. [AJ7] on 06/17/2021 14:01

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.49 Filed 10/26/21 Page 49 of 51

Offender Name: SEDORE, SCOTT LEE

OPT - V

Date of Birth: Date:

Level of Care:

07/19/1967

06/16/2021 14:24

Sex: Provider: Μ

Facility: JCF Jones, Alison W. [AJ7]

Off#:

0210661

Case 2:21-cv-12623-GAD-KGA ECF No. 1, PageID.50 Filed 10/26/21 Page 50 of 51/202/ TO: Clerk of the U.S. District Court Please file this Lawsuit (420,5C, \$ 1983) Seperate and individually from any other pending Case that 1s Currently "ongoing" in the Eastern District Federal Courts. It is a completely seperate Issue and a completely seperate Lowsuit. Thanking you in Advance, Scott Seldro # 21066/ 10/26/2021

Scott Sedore #210661 3. Robert Cotton Correctional Facility

500 North Elm Roa

rackson, Michigan

U.S. District Court
Attn: Clerk of the Court

DECEIVED Latayette Bouler Nov 08 2001 U.B. DISTRIGUED DETROIT MICHIGAN

50